

**South Carolina**  
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## **MEDICAID BULLETIN**

**TO: All Medicaid Providers Eligible for Participation in the S.C. Medicaid Electronic Health Record (EHR) Incentive Program**

**SUBJECT: S.C. Medicaid EHR Incentive Program Update**

This Medicaid Bulletin is published to provide basic information about the registration process for the Medicare and Medicaid Electronic Health Record (EHR) Incentive Programs, some important reminders of certain eligibility requirements, and resources related to the S.C. Medicaid EHR Incentive Program.

### Registration

The Centers for Medicare and Medicaid Services (CMS) began accepting registration for the Medicare and Medicaid Electronic Health Records (EHR) Incentive Programs on January 3, 2011. Eligible providers who wish to participate in either program must first register with CMS' National Level Repository (NLR). CMS' EHR Information Center is open to assist with inquiries: 1-888-734-6433 (primary number) or 888-734-6563 (TTY number); hours of operation are: 6:30 a.m. – 5:30 p.m. (Eastern Time), Monday through Friday, except federal holidays. Resources about the incentive programs are available on the CMS Web site at [www.cms.gov/EHRIncentivePrograms](http://www.cms.gov/EHRIncentivePrograms).

An Eligible Professional (EP) who is eligible for both the Medicare and the Medicaid EHR incentive programs may only participate in one. The NLR requires the EP to indicate the incentive program of choice, "Medicare" or "Medicaid," when registering with the NLR. After the first incentive payment is made, the EP may choose to switch incentive programs; this one-time option must be registered at the NLR level, and must occur before 2015.

An Eligible Hospital (EH) that is eligible for both the Medicare and the Medicaid EHR incentive programs may choose to participate in either program, or both programs. If the EH plans to participate in both Medicare and Medicaid incentive programs in the same year, it is important that the EH select "Both Medicare and Medicaid" during the NLR registration process. An EH that registers only for the Medicaid program (or only the Medicare program) will not be able to manually change their registration (i.e., change to "Both Medicare and Medicaid" or from one program to the other) after a payment is initiated. Making such a change in registration could cause significant delays in receiving a Medicare EHR incentive payment.

After an eligible provider successfully registers with the NLR and indicates participation in the S.C. Medicaid EHR Incentive Program, key information will be transmitted to the S.C. Medicaid State Level Repository (SLR) to identify the provider as having registered at the national level. Then, the EP or EH may begin the registration process with the S.C. Medicaid EHR Incentive Program.

To complete registration with the SLR, the EP or EH must create an account, then confirm NLR data and attest to basic eligibility requirements (S.C. Medicaid provider; and, for EPs, being an EP professional type and not “hospital-based”). The SCDHHS Division of Health Information Technology (HIT Division) will verify the registration information and confirm eligibility to participate. Until January 31, 2011, remaining SLR pages pertaining to the incentive application and attestation will remain locked. Providers are advised to monitor their accounts to determine when these pages have been unlocked for completion.

#### Certain Eligibility Requirements

In addition to meeting the Eligible Professional (EP) or Eligible Hospital (EH) provider requirements, participating providers must meet other program requirements, including those pertaining to patient volume. Auditable data sources of the patient encounters used to determine patient volume must be retained by the EP/EH. This will be especially important for an EP or EH that chooses to aggregate patient encounter data across state lines in order to meet patient volume requirements.

All support documentation for incentive program requirements, including but not limited to that pertaining to patient volume determination, must be retained by the EP or EH for a minimum of six years from the last year of participation in the incentive program, and made available for audit conducted by the SCDHHS, the U.S. Department of Health and Human Services, or contractors acting on their behalf.

For an Eligible Hospital, the law defines a payment year in terms of a federal fiscal year (FFY) beginning with FFY2011. The hospital fiscal year end 2010 Medicare/Medicaid cost report will be used to determine the hospital incentive payments for qualifying hospitals during the October 1, 2010 through September 30, 2011 payment period. Therefore, hospital incentive payments cannot be determined and processed until the South Carolina Department of Health and Human Services obtains receipt of this cost report.

The Medicaid EHR Incentive Program allows for Payment Year One incentive payments to EPs or EHs that have adopted, implemented or upgraded to certified EHR technology, OR demonstrated meaningful use of certified EHR technology; meaningful use will be required for subsequent years of participation.

#### Resources

The South Carolina Health Information Exchange (SCHIE), pronounced SKY-eks, is South Carolina's existing statewide health information exchange (HIE). SCHIE provides an innovative state-level information highway that enables participating health care providers with certified electronic health records to electronically share key clinical information such as medical histories, discharge summaries, medications, allergies, diagnoses, and procedures. SCHIE enables the exchange of immunization records with the DHEC Immunization Registry and works closely with the Office of the National Coordinator for Health Information Technology to ensure it meets all standards for HIE and the requirements in each phase of Meaningful Use related to provider information

exchange. SCHIEx also works closely with SCDHHS to facilitate Medicaid EHR incentive Meaningful Use reporting. Health care providers can begin the SCHIEx onboarding process in January 2011. More information about SCHIEx including the subscription fee and how to connect can be found at [www.schiex.org](http://www.schiex.org)

In South Carolina, CITIA-SC (Center for Information Technology Implementation Assistance in South Carolina) is the Regional Extension Center tasked with helping certain primary care providers take advantage of the incentive payment program. CITIA-SC, part of Health Sciences South Carolina (HSSC), offers **free** consultations about:

- Effective strategies to select, implement and meaningfully use EHR technology
- Upgrading existing Electronic Medical Record (EMR) systems and needs assessment
- Practice workflow redesign
- Meaningful use and other requirements of the incentive payment program
- Preferred EHR vendor products
- Best practices regarding privacy and security of personal health information

Primary care providers who currently have an EMR system are encouraged to contact CITIA-SC to ensure it meets current federal certification standards, a condition of receiving the incentive payments. To contact CITIA-SC, please visit [www.citiasec.org](http://www.citiasec.org) . CITIA-SC is a free service sponsored by HSSC; no purchases are required. For more information, please contact (803) 576-5917.

For more information about the S.C. Medicaid EHR Incentive Program, go to [www.scdhhs.gov/hit](http://www.scdhhs.gov/hit) . Specific questions may be e-mailed to [hit@scdhhs.gov](mailto:hit@scdhhs.gov) .

Thank you for your continued support and participation in the South Carolina Medicaid program.

/S/  
Emma Forkner  
Director

**Note: To receive Medicaid bulletins by email, please register at <http://bulletin.scdhhs.gov/>. To sign up for Electronic Funds Transfer of your Medicaid payment, please go to <http://www.dhhs.state.sc.us/dhhsnew/hipaa/index.asp> and select "Electronic Funds Transfer (EFT) for instructions.**